

**Atlas Minerals**  
**Division of Atlas Corporation**

P.O. Box 1207 Moab, Utah 84532  
(801)259-5131

June 28, 1983

Dale D. Parker, Ph.D.  
Department of Health  
150 West North Temple  
P. O. Box 2500  
Salt Lake City, UT 84110

Dear Sir:

I am writing in response to your letter dated May 4, 1983 regarding Atlas Minerals' solid wastes. I will address your comments by number below:

1. As stated in Richard Blubaugh's letter dated April 22, 1983, the Far West Mine is currently inactive and no disposal is occurring there. The existing site where disposal has occurred in the past will be closed as specified in the Code under the section "Phasing Out Open Dumps". When activities are resumed at this Mine all solid wastes will be disposed of at an Approved Solid Waste Disposal Site.
2. Technically the Far West Mine is not closed at this time; it is under a Temporary Suspension Notice. However, as stated above, Atlas will close and permanently abandon the disposal site in question as specified in the Code of Solid Waste Disposal Regulations under the section "Phasing Out Open Dumps" part 12(a)-(e). This work will begin as soon as possible after receipt of confirmation from your Department.
3. The sludge contained in the separation tank is composed of that material washed from mining equipment mixed with water from the steam cleaner. Consequently the sludge has similar characteristics to those of the waste rock pad that the Mine site is located on. For this reason it is proposed that the sludge from this tank be buried at least two feet deep in the waste rock pad itself.

This mine is currently in a suspended state of operation and therefore this separation system is not now being used. The sludge tank currently contains approximately 29 ft.<sup>3</sup> of sludge as a result of activities prior to this mine's suspension. If this proposal is accepted this sludge will be removed and buried as proposed.

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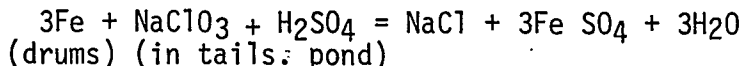
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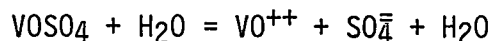
**Atlas Minerals**  
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SHEET 2      DATE      June 28, 1983      TO      Dale D. Parker Ph.D.

4. The drums in the tailings pond will be dissolved according to the reaction:



The Vanadium in the drums is in the chemical state  $\text{VO}^{++}$  and would exist as sulfate salts which are soluble in the tailings pond water.



5. Atlas Minerals does wish to withdraw the previously filed "Notifications" for the reasons stated in Richard Blubaugh's letters dated January 17, 1983 and April 22, 1983. In your letter you stated it would be necessary to conduct on-site inspections of each mine and the mill in order for this to be done. An inspection of the mill should not be necessary since we have no record of ever filing a "Notification" for the mill facility. In addition, we feel inspections of each property for which a "Notification" was filed should not be necessary for the following reasons:
- i) The "Notifications" were filed because of the possibility that mine waste would be regulated under the Hazardous Waste Regulations. Since this waste is not regulated under these Regulations an inspection of the waste would serve no purpose.
  - ii) Atlas submitted "Notifications" on all potential mining properties, many of which Atlas has never actively mined and some of which no mining activity have ever occurred by anyone.
  - iii) In order to inspect each of these properties several days would be required by members of both the Department of Health and Atlas' staff. Since we can identify no useful purpose to these inspections, it seems they would be an unnecessary waste of time for both parties.

We trust this satisfies your concerns and requests expressed in your May 4, 1983 letter and we await your response to the following items:

- Confirmation from the Department of Health with Atlas' plan to close the existing disposal site at the Far West Mine.

**Atlas Minerals**  
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SHEET 3

DATE

June 28, 1983

TO

Dale D. Parker Ph.D.

- Approval from the Department of Health to bury the sludge from the oil-separation tank as proposed.
- Withdrawl of Atlas' Hazardous Waste "Notifications" as requested.

Please contact me or Richard Blubaugh with any questions you may have concerning these matters.

Respectfully,



Ricky J. Broschat  
Environmental Specialist

RJB/akl

cc: R. Blubaugh

T. Tetting  
Division of Oil, Gas and Mining